

# EXHIBIT A

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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NATALIE REESER,

Plaintiff,

Hon. George Caram Steeh

Case No: 2:14-cv-11916

v.

HENRY FORD HOSPITAL,

Defendant.

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MILLER COHEN, P.L.C.  
Keith D. Flynn (P74192)  
Attorney for Plaintiff  
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VARNUM LLP  
Terrence J. Miglio (P30541)  
Barbara E. Buchanan (P55084)  
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**DEFENDANT'S RULE 26(a)(1) INITIAL DISCLOSURES**

NOW COMES HENRY FORD HOSPITAL, ("Defendant"), by and through its attorneys, VARNUM LLP, and states for its Initial Disclosures as follows:

Pursuant to Fed.R.Civ.P. 26(a)(1):

**SUBSECTION (A):**

The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information;

**RESPONSE:**

The following persons, as well as other present and former employees who have yet to be identified, are believed to have discoverable information concerning Plaintiff's employment with Defendant including her job duties, performance, and its policies, procedures, work rules, and business practices which governed her employment, as well as facts and circumstances surrounding her termination. Each of these individuals is a current or former management level employee of Defendant and may be contacted only through counsel.

1. Maria Anger  
Henry Ford Medical Laboratories  
Henry Ford Health System  
2799 W. Grand Blvd.  
Detroit, Michigan 48202
2. Fiona Bork  
Henry Ford Medical Laboratories  
Henry Ford Health System  
2799 W. Grand Blvd.  
Detroit, Michigan 48202
3. Nawaal Elhaddi  
Henry Ford Health System  
2799 W. Grand Blvd.  
Detroit, Michigan 48202

4. Alicia Estell  
Henry Ford Medical Laboratories  
Henry Ford Health System  
2799 W. Grand Blvd.  
Detroit, Michigan 48202
5. Luain Hajjar  
Henry Ford Medical Laboratories  
Henry Ford Health System  
2799 W. Grand Blvd.  
Detroit, Michigan 48202
6. Jill E. Hood, PHR  
Henry Ford Health System  
2799 W. Grand Blvd.  
Detroit, Michigan 48202
7. Julisa Garcia  
Henry Ford Medical Laboratories  
Henry Ford Health System  
2799 W. Grand Blvd.  
Detroit, Michigan 48202
8. Kathy Oswald  
Henry Ford Health System  
One Ford Place  
Detroit, Michigan 48202
9. Rebecca Pilarski  
Henry Ford Health System  
2799 W. Grand Blvd.  
Detroit, Michigan 48202
10. Debra Temrowski  
Henry Ford Health System  
2799 W. Grand Blvd.  
Detroit, Michigan 48202

11. John Waugh  
Henry Ford Health System  
2799 W. Grand Blvd.  
Detroit, Michigan 48202
12. Martha Wiseheart  
Henry Ford Medical Laboratories  
Henry Ford Health System  
2799 W. Grand Blvd.  
Detroit, Michigan 48202

**SUBSECTION (B):**

A copy of, or a description by category and location of, all documents, data compilations and tangible things that are in the possession, custody or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment;

**RESPONSE:**

- 1) Plaintiff Natalie Reeser's personnel records with Defendant.
- 2) Employment policies and procedures of Defendant.

**SUBSECTION (C):**

A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered;

**RESPONSE:**

This is not applicable to Defendant, as its position is that Plaintiff's Complaint should be dismissed, with prejudice, and Plaintiff is not entitled to any damages.

**SUBSECTION (D):**

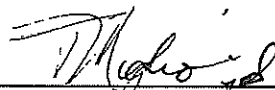
For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment;

**RESPONSE:**

None.

Respectfully submitted,

VARNUM LLP



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Barbara E. Buchanan (P55084)  
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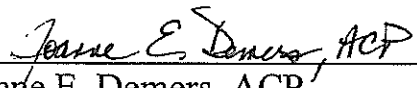
Dated: August 21, 2014

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21st day of August 2014, I served Defendant's Rule 26(A)(1) Initial Disclosures and this Certificate of Service upon:

Keith D. Flynn, Miller Cohen, P.L.C., 600 W. Lafayette Blvd.,  
4th Floor, Detroit, MI 48226.

by placing said documents in an envelope with proper postage affixed thereto and placing same in the U.S. Mail.

  
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Joanne E. Demers, ACP

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